



February 27, 2019

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VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW, Suite TW-A325
Washington DC 20554

Re: **Annual 64.2009(e) CPNI Certification for Calendar Year 2018**
EB Docket No. 06-36

1. Date filed: February 27, 2019
2. Name of companies covered by this certification:
BT Americas Inc.
BT Conferencing Video Inc.
BT LatAm Inc.
BT Procure LLC
Radianz Americas Inc.
(collectively, "BTA and affiliates" or "company")
3. Form 499 Filer IDs:
BT Americas Inc. -- 809483
BT Conferencing Video Inc. -- 827277
BT LatAm Inc. -- 821680
BT Procure LLC -- 832730
Radianz Americas Inc. -- 823182
4. Name of signatory: A. Sheba Chacko
5. Title of signatory: Chief Regulatory Counsel
6. Certification:

I, A. Sheba Chacko, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to protect its customers'

information and ensure compliance with the Commission's CPNI rules (*see* 47 C.F.R. § 64.2001 *et seq.*). As stated in the CPNI compliance statement attached, BT's companies in the US that are subject to the Commission's jurisdiction – BT Americas Inc., BT Conferencing Video Inc., BT LatAm Inc., BT Procure LLC, and Radianz Americas Inc. – do not operate as telecommunications or common carriers in the U.S. and hence the CPNI certification requirements do not apply to these companies except to the extent these companies provide interconnected VoIP services.

Attached to this certification is an accompanying statement explaining how BTA and affiliates' procedures ensure that these companies are in compliance with the applicable requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

BTA and affiliates have not taken actions against data brokers in the past year.

BTA and affiliates have not received customer complaints in the past year concerning the unauthorized release of CPNI

BTA and affiliates represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. They also acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Respectfully submitted,

BT AMERICAS INC,
BT CONFERENCING VIDEO INC.
BT LATAM INC.
BT PROCURE LLC
RADIANZ AMERICAS INC.



By: A. SHEBA CHACKO
Chief Regulatory Counsel
(as agent of the company)

Attachment: Statement of Compliance

Statement of CPNI Compliance

BT Americas Inc., BT Conferencing Video Inc., BT LatAm Inc., BT Procure LLC, and Radianz Americas Inc. (hereinafter collectively referred to as “BTA and its affiliates”) provide to global enterprises information communications technology services that include systems integration services, security, consulting, information services, and “telecommunications,” but not “telecommunications services” as those terms are defined in 47 U.S.C. §§ 153(24), (50) and (53), respectively. Hence BTA and affiliates are not telecommunications carriers, as defined in 47 U.S.C. § 153(51). However, one or more of these companies may provide interconnected VoIP services.

BTA and its affiliates do not use any information that would be considered CPNI except in the provision or marketing of services to enterprise customers that are within the category of service to which the global enterprise customers are already subscribed.

BTA and its affiliates do not use or disclose these enterprise customers’ information except as contractually agreed with these enterprise customers.

The US customer information of BTA and its affiliates is protected via a combination of awareness, training regarding information, data and security policies and procedures of BTA and its affiliates, prevention, deterrence and minimization of attacks.

- *Awareness of Policies and Procedures and Training* – all employees of BTA and its affiliates are required to electronically agree to abide by business principles that govern the conduct of BTA and its affiliates. Amongst other things, these business principles require employees to handle customer information in an ethical and secure manner that is also compliant with applicable laws regarding the protection of such customer and user information. Employees must renew their commitment to abide by these business principles every year and complete mandatory online training regarding security and the protection of customers’ information at least every two years. Failure to comply with these business principles makes employees subject to disciplinary action that may include termination of employment. All third parties – e.g., suppliers, contractors and agents – are also required via contract to comply with these security, data and information retention policies.
- *Contractual Commitments Regarding Protection of Enterprise Customers’ Information* – in addition, US customers’ information is protected in a manner consistent with the contractual commitments negotiated between BTA and its affiliates on the one hand and enterprise customers on the other. BTA and its affiliates have deployed tools, processes and policies to allow BTA and its affiliates to track and comply with these contractual obligations. The global enterprise customers of BTA and affiliates are also served by account representatives who amongst other things manage the flow of information between these enterprise customers and BTA and its affiliates.

- *Assurance and Audit* – BTA and its affiliates’ internal assurance and audit function is comprised of three lines of defense. The first line of defense is at the individual company level whereby employees are trained on compliance, are bound to comply by the terms of employment and are advised to speak up regarding noncompliance. The second line of monitoring and audit consists of teams in human resources, finance, security, IT, revenue assurance, legal and regulatory, and compliance who are responsible for reviewing the management of risks and reporting to appropriate executive risk oversight committees. The third line of defense is Internal Audit that is an independent assurance team that undertakes a program of risk and compliance-based audits and reports findings to the Board Audit and Risk Committee of BT Group plc, the parent of BTA and its affiliates. Corrective actions are taken by the appropriate persons where a need for this is identified by reviews or audits carried out.
- *Physical and Logical Security* – in addition, the networks, systems and facilities of BTA and its affiliates are protected by a robust security structure that constantly monitors threats to BT’s systems, assets and data, including US customer information.
- BTA and its affiliates do not provide telephone exchange services and therefore are not subject to the CPNI requirements that relate to telephone exchange services.
- BTA and its affiliates may, pursuant to the express affirmative consent of the customer as set forth in a customer contract, provide services jointly with affiliates or a third party.